

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

CENGAGE LEARNING, INC., BEDFORD,
FREEMAN & WORTH PUBLISHING GROUP, LLC
d/b/a MACMILLAN LEARNING, MCGRAW HILL
LLC, and PEARSON EDUCATION, INC.,

Plaintiffs,

v.

DOES 1 – 50 d/b/a Library Genesis, bookwarrior,
cdn1.booksdl.org, jlibgen.tk, libgen.ee, libgen.fun,
libgen.gs, libgen.is, libgen.lc, libgen.li, libgen.pm,
libgen.rocks, libgen.rs, libgen.space, libgen.st,
libgen.su, library.lol, and llhlf.com,

Defendants.

Civil Action No. 23-cv-08136-CM

**PLAINTIFFS’ MOTION FOR ENTRY OF A DEFAULT JUDGMENT,
PERMANENT INJUNCTION, AND POST-JUDGMENT RELIEF ORDER**

PLEASE TAKE NOTICE that upon the accompanying memorandum of law and the declarations filed in support, and the entire record herein, Plaintiffs Cengage Learning, Inc., Bedford, Freeman & Worth Publishing Group, LLC d/b/a Macmillan Learning, McGraw Hill LLC, and Pearson Education, Inc. (collectively, “Plaintiffs”) hereby move for Entry of a Default Judgment, Permanent Injunction, and Post-Judgment Relief Order against Defendants Does 1-50 d/b/a Library Genesis, bookwarrior, cdn1.booksdl.org, jlibgen.tk, libgen.ee, libgen.fun, libgen.gs, libgen.is, libgen.lc, libgen.li, libgen.pm, libgen.rocks, libgen.rs, libgen.space, libgen.st, libgen.su, library.lol, and llhlf.com, as further identified and described in the memorandum of law and Appendix A to Plaintiffs’ proposed order (collectively, “Defendants”). Pursuant to Section V.E.1 of the Court’s Individual Practices and Procedures,

attached hereto as Appendix A is a notice to Defendants concerning this Motion for Entry of a Default Judgment, Permanent Injunction, and Post-Judgement Relief Order.

As set forth in the memorandum of law and proposed order, Plaintiffs seek a default judgment, permanent injunction, and additional relief under Federal Rules of Civil Procedure 55(b)(2) and 65(d), the Copyright Act of 1976, §§ 101 *et seq.*, and the Court's inherent equitable powers and its power to coerce compliance with its lawful orders. Plaintiffs request that the Court direct entry of final judgment in favor of Plaintiffs against Defendants as set forth in the proposed order.

Dated: March 1, 2024

Respectfully submitted,

/s/ Kevin Lindsey

Kevin Lindsey (*pro hac vice*)

Matthew J. Oppenheim

OPPENHEIM + ZEBRAK, LLP
4530 Wisconsin Avenue NW, 5th Floor
Washington, DC 20016
Tel: (202) 480-2999
matt@oandzlaw.com
klindsey@oandzlaw.com

Attorneys for Plaintiffs